

REMARKS/ARGUMENTS

Reconsideration is respectfully requested. Claims 1-30 are pending. Claims 1-30 are rejected. For the reasons set forth below, Applicants respectfully submit that all pending claims are allowable.

I. Status of Application

On March 14, 2006, Applicants submitted a Renewed Petition to make special, electing invention set out in claims 15-30, in response to the initial Decision on Petition to Make Special dated February 9, 2006.

In response to the Applicants' Renewed Petition, on March 30, 2006, Applicants' Petition to make special was granted. Copy of the Decision granting Petition to Make Special is enclosed for the Examiner's convenience.

Notwithstanding the grant of the Petition to Make Special, the Office Action mailed on October 9, 2007 indicates claims 1-30 as pending, and further, sets forth rejection of claims 1-30.

While for purposes of the present response to the outstanding office action, Applicants assume that claims 1-30 are pending in the present application, Applicants respectfully request the Examiner to clarify the status of the pending claims in view of the grant of the Petition to Make Special.

I. Obviousness Rejections

Claims 1-30 are rejected as obvious over US Publication No. 2002/0188556 ("Colica reference"). See Office Action, p.2. For the reasons set forth below, Applicants respectfully submit that claims 1-30 are allowable.

A. Rejection of Claims 1-14

Claim 1 is directed to a combination including a database manager module, a parameter builder module, and an accumulation analyzer module to determine a concentration of exposure.

In rejecting claim 1, the Examiner refers to various portions of the Colica reference, and asserts that the Colica reference discloses the claimed database manager module and the accumulation analyzer module to determine a concentration of exposure, and further, while acknowledging that Colica reference does not teach a parameter builder module, the Examiner further asserts that that the claimed parameter builder module is an obvious variant of the Colica teachings. See Office Action, p.2.

More specifically, the Examiner asserts that the Colica reference teaches processing may involve receiving and updating information identifying individual operating units of a business, and further, that one skilled in the art would recognize these processes as “parameter building”, and finally, that one of ordinary skill in the art would modify the Colica teachings with the motivation of efficiently, accurately and effectively track exposures of a business. See Office Action, pp. 2-3.

Applicants respectfully disagree.

Regarding the claimed accumulation analyzer module, the Examiner refers to page 4, parag 38 of the Colica reference. See Office Action, p.2. However, on page 4, the Colica reference does not have paragraph 38. Rather, paragraph 38 is on page 3 of the Colica reference.

Assuming the Examiner intended to refer to page 3, paragraph 38 of the Colica reference, that portion of the Colica reference discloses:

“system 100 [which] may be used by a business such as business 10 of FIG. 1A to monitor and analyze exposures of each of the operating units 12a-n based on each of the different products 20a-n. Management devices 120 may be operated by management users (such as manager 30 of business 10) to receive and manipulate exposure data generated by system 100. In one embodiment, only users with special access permission may access system 100 via management devices 120 (e.g., a business may choose only grant access to risk managers or senior management of the business). In some embodiments, only designated individuals may utilize and operate user devices 110 (e.g., designated risk managers at each operating unit may be chosen to enter exposure information into the system).

See Colica reference, page 3, paragraph 38.

As understood, this portion of the Colica reference does not disclose an accumulation analyzer module to determine a concentration of exposure as set forth in claim 1 of the present application.

Furthermore, in referring to page 8, paragraph 106 of the Colica reference, and specifically, to Colica reference disclosure that “processing ... may involve receiving and updating information identifying individual operating units of a business”, the Examiner asserts that one skilled in the art would modify the Colica reference to render obvious the claimed parameter builder module. See Office Action, p.2.

Applicants respectfully disagree.

The portion of the Colica reference to which the Examiner refers discloses:

In general, processing begins at 702 where input data is defined and mapped. This data definition and mapping process may include some steps which are performed once or infrequently as well as steps which are performed on a regular basis. For example, processing at 702 may involve receiving and updating information identifying individual operating units of a business and individual products of a business. This information may be input relatively infrequently, and only as information about operating units or products changes. Other information and data may be defined and mapped more frequently. Details about mapping and definition of data are provided below in conjunction with a description of FIG. 8, where the mapping will be present in three different figures (product mapping, collateral mapping, and operating unit mapping).

See Colica reference, page 8, parag. 106.

As understood, the Colica reference fails to render obvious the claimed invention set forth in claim 1 of the present application including, among others, a parameter builder module. Accordingly, Applicants traverse the Examiner's rejections and respectfully submit that claim 1 and claims 2-14 dependent therefrom, are allowable.

With respect to the dependent claims 2-14, Applicants renew all of the arguments set forth above in distinguishing claim 1 from the cited reference, and respectfully submit that, at least for the same reasons, Applicants traverse the Examiner's rejections and respectfully submit that dependent claims 2-14 are allowable. However, Applicants reserve the right to address each of the Examiner's rejections of the dependent claims in the event that the Examiner does not deem claim 1 to be allowable.

B. Rejection of Claims 15-30

With respect to claims 15-30, the Examiner asserts that claims 15-30 repeat limitations of claims 1-14 or teach features that are obvious variations of Colica teachings, and further, that the reasons for rejection and motivation to modify the Colica teachings are incorporated from above. See Office Action, p.5.

Independent claim 15 is directed to a combination including defining parameters, determining a concentration of exposure using a financial perspective to determine exposure for an exposure location, and generating an output.

It is unclear as to the specific basis upon which the Examiner has rejected independent claims 15-30. Notwithstanding, Applicants traverse the Examiner's rejections, and to the extent that the Examiner is relying upon the same grounds for rejection as that set forth for claims 1-14, Applicants herein renew all of the arguments set forth above in distinguishing the Colica reference, and respectfully submit that, at least for the same reasons, Claims 15-30 are allowable.

III. Status of Drawings As Filed

In the Office Action Summary of the Office Action mailed October 9, 2007, item (10), the Examiner has indicated an "X" for the drawings filed on January 30, 2007. However, there is no indication as to whether the drawings are either accepted or objected to by the Examiner. Furthermore, Applicants respectfully submit that no drawings were submitted on January 30, 2007, and that the

figures as filed with the application on March 11, 2004 are the only submission of drawings in this case.

Accordingly, Applicants respectfully request clarification regarding the Examiner's approval status of the drawings submitted on March 11, 2004 in the present application.

In the event that the Examiner does not deem the pending claims to be in allowable condition, Applicants respectfully request a telephonic interview to advance the prosecution of this application.

The Commissioner is authorized to charge any deficiencies in fees and credit any overpayment of fees to Deposit Account No. 50-2019. A duplicate page is enclosed.

Respectfully submitted,

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By _____

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